

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF PENNSYLVANIA**

STEVE WALLING, Individually and on
Behalf of All Others Similarly Situated,

Plaintiff,

v.

KRAFT HEINZ COMPANY, BERNARDO
HEES, PAULO BASILIO, DAVID KNOPF,
GEORGE ZOGHBI, CHRISTOPHER R.
SKINGER, VINCE GARLATI, and 3G
CAPITAL INC.,

Defendants.

Case No. 2:19-cv-00214-MPH

CLASS ACTION

Electronically Filed

**MOTION OF TIMBER HILL LLC FOR APPOINTMENT AS LEAD PLAINTIFF AND
APPROVAL OF ITS SELECTION OF LEAD COUNSEL**

Timber Hill LLC (“Timber Hill”) herby moves for an order: (1) appointing Timber Hill as lead plaintiff in this action pursuant to the Private Securities Litigation Reform Act of 1995 (“PLSRA”) on behalf of investors that purchased call options on Kraft Heinz common stock, sold put options on Kraft Heinz common stock and/or purchased forward options on Kraft Heinz common stock; (2) approving Timber Hill’s selection of Entwistle & Cappucci LLP as Lead Counsel; and (3) awarding such further relief as the Court may deem just and proper.

Respectfully Submitted,

/s/ Andrew J. Entwistle

Andrew J. Entwistle

ENTWISTLE & CAPPUCCI LLP

500 W. 2nd Street, Suite 1900-16

Austin, Texas 78701

Telephone: (512) 710-5960

Email: aentwistle@entwistle-law.com

*Counsel for Movant Timber Hill LLC and
Proposed Lead Counsel for the Class*